



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 22 2004

REPLY TO THE ATTENTION OF  
(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Dennis Milby  
Applied Composites Corporation  
333 North 6<sup>th</sup> Street  
St. Charles, Illinois 60174

Re: Notice of Violation /  
Finding of Violation  
Applied Composites Corp.  
St. Charles, Illinois

Dear Mr. Milby:

The United States Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) and Finding of Violation (FOV) to Applied Composites Corporation (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Illinois State Implementation Plan (SIP) and your Illinois Title V Clean Air Act Permit Program (CAAPP) permit at your St. Charles, Illinois facility.

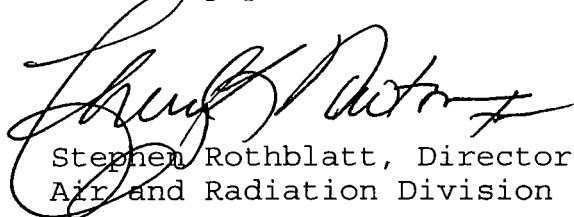
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the NOV/FOV.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Daniel Schaufelberger. You may call him at (312) 886-6814 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,



Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc: Julie Armitage, Acting Manager  
Compliance and Enforcement Section  
Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF:	)	
	)	
Applied Composites	)	NOTICE OF VIOLATION
Corporation	)	
St. Charles, Illinois	)	EPA-5-04-14-IL
	)	
	)	
Proceedings Pursuant to	)	
Section 113(a)(1) of the	)	
Clean Air Act, 42 U.S.C.	)	
§ 7413(a)(1)	)	

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**NOTICE AND FINDING OF VIOLATION**

The United States Environmental Protection Agency (U.S.EPA) is issuing this Notice and Finding of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). U.S.EPA finds that Applied Composites Corporation (Applied Composites) is violating the Illinois State Implementation Plan (SIP) and its Illinois Title V Clean Air Act Permit Program (CAAPP) permit, as follows:

**Statutory and Regulatory Background**

1. On March 7, 1995, U.S. EPA gave the Illinois Title V Clean Air Act Permit Program (CAAPP) interim approval as a 40 C.F.R. Part 70 permit program under the authority of Section 502 of the Act, 42 U.S.C. § 7661(a) (60 Fed. Reg. 12478). On December 4, 2001, U.S. EPA gave the Illinois Title V CAAPP final approval as a 40 C.F.R. Part 70 permit program (66 Fed. Reg. 62946). The regulation at 40 C.F.R. § 70.6(b)(1) specifies that all terms and conditions in a permit issued under a Part 70 program are enforceable by U.S. EPA under the Act.
2. On September 9, 1994, U.S. EPA approved 35 Ill. Admin. Code Part 218, as part of the federally enforceable SIP for Illinois. 59 Fed. Reg. 46562.
3. 35 Ill. Admin. Code § 218.301, and Condition 7.1.3.b. of Applied Composites Title V CAAPP permit, require that no "person shall cause or allow discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit", except as provided in Sections 218.301 and 218.302. If no odor nuisance exists the limitation of

this section apply only to photochemically reactive materials.

4. 35 Ill. Admin. Code § 218.666(a)(1) and Condition 7.1.5.a.i. of Applied Composites Title V CAAPP permit, requires compliance with any of the following methods:

Use polyester resin material (PRM) with a monomer content less than those specified under Section 218.666(a)(1)(A)i-v;

Use a closed-mold system or pultrusion system which results in less than 4% weight loss of PRM.

Use a vapor suppressed PRM approved by IEPA, etc.;

Use any materials or processes that are demonstrated to the satisfaction of the Agency to achieve VOM emission levels equivalent to any of the above. This alternative must be approved by IEPA and U.S. EPA in a federally enforceable permit or as a SIP revision.

#### Applied Composites Facility

5. Applied Composites owns and operates a fiberglass reinforced plastics manufacturing facility at 333 North Sixth Street, St. Charles, Illinois.
6. On June 14, 1999, Illinois EPA issued Applied Composites a Title V CAAPP permit under the Illinois Part 70 program for the St. Charles, Illinois facility.
7. The Applied Composites CAAPP permit defines the Compound Area/Maturation room as an emission unit (Emission Unit 01).
8. The VOM styrene, used as a monomer in all of the resins at the Applied Composites facility, is considered a "Photochemically Reactive Material" as defined by 35 Ill. Adm. Code § 211.4690.
9. VOM (styrene) emissions from the Applied Composites Compounding/Maturation process are subject to the 8 lb/hr emissions limitation established at 35 Ill. Adm. Code § 218.301, in the Illinois SIP.
10. On October 12, 1992, stack tests for VOM (styrene) emissions were performed for the Compounding/Maturation process emissions at the Applied Composites facility.

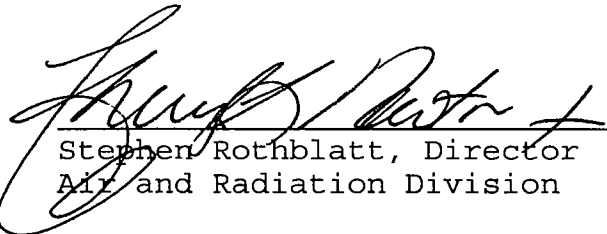
11. The results of the stack testing show a total VOM (styrene) emission rate of 18.69 pounds per hour with the mixing vessels covered and 20.94 pounds per hour with the mixing vessels uncovered.
12. Applied Composites currently uses PRM with an as applied monomer content ranging from 31% to 61%.

Violations

14. Applied Composites has operated, and continues to operate, its Compounding/Maturation process (Emission Unit 01) with VOM (styrene) emissions in excess of the 8 lb/hr limitation established at 35 Ill. Admin. Code § 218.301 and at Condition 7.1.3.b. of Applied Composites Title V CAAPP permit.
15. Applied Composites has failed to comply with the polyester resin material monomer content operating requirements as specified under 35 Ill. Admin. Code § 218.666(a)(1)(A) and at Condition 7.1.5.a.i. of its Title V CAAPP permit.

4/22/07

Date

  
Stephen Rothblatt, Director  
Air and Radiation Division

CERTIFICATE OF MAILING


I, Betty Williams, certify that I sent a Notice and Finding of Violation, No. EPA-5-04-14-IL, by Certified Mail, Return Receipt Requested, to:

Dennis Milby  
Applied Composites Corporation  
333 North 6<sup>th</sup> Street  
St. Charles, Illinois 60174

I also certify that I sent copies of the Notice and Finding of Violation by first class mail to:

Julie Armitage, Acting Manager  
Compliance and Enforcement Section  
Illinois Environmental Protection Agency  
1021 North Grand Avenue  
Springfield, Illinois 62702

on the 23rd day of April, 2004.

  
Betty Williams, Secretary  
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320 000601783363